

# EXHIBIT J

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STATE OF NEW YORK  
OFFICE OF ATTORNEY GENERAL

In re:

## FINANCIAL STATEMENTS INVESTIGATION

October 5, 2020

9 : 35 a . m .

## VIDEOCONFERENCE EXAMINATION

UNDER OATH of ERIC F. TRUMP, held at 725  
Fifth Avenue, New York, New York, before  
Wayne Hock, a Notary Public of the State  
of New York.

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2 A P P E A R A N C E S:

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STATE OF NEW YORK  
OFFICE OF ATTORNEY GENERAL  
28 Liberty Street  
New York, New York 10005

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BY: MATTHEW COLANGELO, ESQ.  
(via videoconference)  
ERIC R. HAREN, ESQ.  
(via videoconference)  
LOUIS M. SOLOMON, ESQ.  
(via videoconference)  
COLLEEN K. FAHERTY, ESQ.  
(via videoconference)  
AUSTIN THOMPSON, ESQ.  
(via videoconference)  
GARY FISHMAN, ESQ.  
(via videoconference)  
ALEX FINKELSTEIN, ESQ.  
(via videoconference)  
KEVIN WALLACE, ESQ.  
(via videoconference)

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THE LAW OFFICES OF ALAN S. FUTERFAS  
565 Fifth Avenue  
New York, New York 10017

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BY: ALAN S. FUTERFAS, ESQ.  
(via videoconference)  
-and-

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A P P E A R A N C E S: (Continued)

MUKASEY FRENCHMAN & SKLAROFF LLP  
Attorneys for Witness  
2 Grand Central Tower  
140 East 45th Street  
New York, New York 10017  
BY: MARC L. MUKASEY, ESQ.  
(via videoconference)

ALSO PRESENT:

SHAWN BUDD, Videographer  
(via videoconference)

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THE VIDEOGRAPHER: We are on the  
record.

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This is the videographer  
speaking, Shawn Budd, with Veritext  
Legal Solutions.

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Today's date is October 4, 2020  
[sic] and the time is 9:35 a.m.

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We are here to take the remote  
video deposition of Eric Trump in the  
matter of Financial Statements  
Investigation.

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Will counsel please introduce  
themselves for the record.

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MR. COLANGELO: This is Matthew  
Colangelo from the New York Attorney  
General's office.

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And just one correction to the  
record, Mr. Budd, I believe you said  
today was October 4. Today is the 5th  
of October.

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THE VIDEOGRAPHER: My apologies,  
yes.

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MR. COLANGELO: Also attending  
this morning from the Attorney

General's office are Colleen Faherty, Austin Thompson, Alex Finkelstein, Eric Haren, Gary Fishman, Kevin Wallace, and Lou Solomon.

And before we swear the witness,  
let's have Mr. Trump's counsel  
introduce themselves as well.

MR. FUTERFAS: Good morning, Alan  
Futerfas for Mr. Trump.

Marc, you wanted to say hello?

MR. MUKASEY: Sure.

Good morning, Marc Mukasey of  
Mukasey Frenchman and Sklaroff also  
for Eric Trump.

And Matthew, let me ask, are all the folks you just named employees of the Attorney General's office and lawyers on this case or do they have different positions? And is anybody who's not employed by your office on the phone?

MR. COLANGELO: Nobody not employed by any office is on the phone. Everybody I introduced is an

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2       attorney with the Attorney General's  
3       office working on this matter.

4                    MR. MUKASEY: Thank you.

5                    MR. COLANGELO: Wayne, can you  
6        swear the witness.

7        E R I C    F. T R U M P, having  
8        been first duly sworn by a  
9        Notary Public of the State of  
10      New York, upon being examined,  
11      testified as follows:

12     EXAMINATION BY

13     MR. COLANGELO:

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1 E. Trump

2 A. Yes.

3 Q. So did you start working at The  
4 Trump Corporation immediately after  
5 graduating from college?

6 A. Virtually, yes.

7 Q. And can you tell me what --

8 MR. COLANGELO: Withdrawn.

9 Q. You just said that you work for  
10 The Trump Corporation.

11                           Can you tell me what The Trump  
12 Organization is?

13           A.        I will let somebody who's much  
14        better at answering entity questions  
15        answer that than me, meaning structural  
16        ownership questions. I would let somebody  
17        else handle that. They'd do a much better  
18        job than I would.

19 Q. Okay.

E. Trump

Mr. Trump, if you'd like to assert your -- he will read an assertion of rights at this point.

THE WITNESS: The Attorney General of the State of New York has abandoned fairness, justice, impartiality when it comes to my family and to our business. Before Letitia James even took office, she publicly stated that she already concluded that The Trump Organization engaged in wrongdoing and that she was going to use the power of her office to investigate our company, target my family, and go after my father, the President of the United States. She said that, if elected, she would use her office to look into every aspect of my father's real estate deals. She swore that she would definitely sue him. She claimed that he was an illegitimate president more times than I can count. She boasted on video that she would be, and I quote, "a

E. Trump

2 real pain in the ass." And she  
3 declared, "just wait until I'm in the  
4 Attorney General's office. I've got  
5 my eyes on Trump Tower." In perhaps  
6 her most egregious statement while  
7 campaigning she said, "we must join  
8 with law enforcement and other  
9 attorney generals across this nation  
10 in removing this President from  
11 office. It's important that everyone  
12 understand that the days of Donald  
13 Trump are coming to an end."

14 Q. Mr. Trump, my question was  
15 what's your understanding what The Trump  
16 Organization is.

17 MR. FUTERFAS: And he's  
18 responding to the question with an  
19 assertion of rights which he will  
20 make.

21                   Please continue reading your  
22 assertion and your response.

23 MR. COLANGELO: Hang on one  
24 second.

25 Mr. Futerfas. I'm trying to

1 E. Trump  
2 conduct this examination as  
3 expeditiously as we can out of respect  
4 for the witness and the court reporter  
5 and the videographer and all the  
6 attorneys. My question was simply:  
7 What's your understanding of what The  
8 Trump Organization is.

17 Thank you.

18 Q. Go ahead, Mr. Trump.

19           A.        I'd like to start again if I'm  
20       going to be interrupted.

21           Q.        Mr. Trump, I'm not going to have  
22 my time and all my colleagues' time  
23 wasted. You've already made part of your  
24 statement on the record. Why don't you  
25 proceed.

E. Trump

A. Thank you.

3                   Letitia James made those  
4 statements without a shred of evidence,  
5 all while using them to fundraise and  
6 solicit financial support for her  
7 campaign.

1 E. Trump

2                   The Attorney General has  
3                   continued to make public statements and  
4                   pronouncements that reflect clear bias,  
5                   and this conduct for an elected official  
6                   who's supposed to act without prejudice or  
7                   favor is unlawful, it's unethical, and  
8                   it's grossly improper.

25 After seeing Letitia James'

1 E. Trump  
2 videos and statements, the Attorney  
3 General of the State of Louisiana, Jeff  
4 Landry, stated, "this is what" --

5 Q. Mr. Trump, I'm sorry, but this  
6 answer is not responsive. If you have an  
7 assertion of rights, please make your  
8 assertion of rights. I can't spend the  
9 entire day with this sort of obstreperous  
10 answer. If you have an assertion of  
11 rights, please make your assertion of  
12 rights, but the answer you've been giving  
13 so far is not responsive to my question.

14 MR. FUTERFAS: He'll have an  
15 assertion of rights in ninety seconds.

16 O. Go ahead.

17           A.       After Letitia James' videos and  
18 statements, Attorney General of Louisiana,  
19 Jeff Landry, stated, "this is what an  
20 abuse of prosecutorial discretion looks  
21 like. No prosecutor should run on a  
22 platform of threatening an American  
23 citizen, his family, and his private  
24 business with investigations and lawsuits,  
25 all for political gain." The United

1 E. Trump  
2 States Supreme Court has stated that  
3 prosecutors are prohibited from engaging  
4 in arbitrary fishing expeditions,  
5 initiating investigations out of malice or  
6 an intent to harass, or using the power to  
7 try and interfere with a President's  
8 official duties.

15 Years ago the Supreme Court  
16 ruled that one of the Fifth Amendment's  
17 basic functions is to protect innocent  
18 individuals. Given the circumstances, it  
19 is clear that the Attorney General is not  
20 proceeding impartially and is not  
21 proceeding without bias or favor. She's  
22 carrying out a deliberate biased political  
23 agenda that she promised as a candidate in  
24 order to hurt my family and to help the  
25 opposing political party. This is a

1 E. Trump  
2 fundamental violation of due process. It  
3 is a fundamental violation of my rights as  
4 a citizen.

18                   This will be my answer to all  
19 further statements.

20 Q. Mr. Trump, when you joined The  
21 Trump Corporation, what was your title?

22           A.       For all the reasons provided in  
23 my answer which are incorporated herein in  
24 its entirety, I decline to answer that  
25 question.

E. Trump

Q. Do you have any reason to think that Mr. McConney would have recorded a telephone conversation with you that didn't, in fact, happen?

9           A.       For all the reasons provided in  
10      my answer, which is incorporated herein in  
11      its entirety, I decline to answer the  
12      question.

13 Q. Did you tell Mr. McConney in  
14 September, 2012 that New Castle was lands  
15 to be donated?

16           A.       For all the reasons provided in  
17 my answer, which is incorporated herein in  
18 its entirety, I decline to answer the  
19 question.

20 Q. Had you, in fact, made a  
21 decision that the New Castle portion of  
22 the Seven Springs Estate was to be donated  
23 by September 24, 2012?

24           A.       For all the reasons provided in  
25 my answer, which is incorporated herein in

1 E. Trump

2 its entirety, I decline to answer the  
3 question.

4 Q. Did you tell Mr. McConney in  
5 September, 2012 that the North Castle land  
6 was to be used as part of the main  
7 mansion?

8           A.       For all the reasons provided in  
9 my answer, which is incorporated herein in  
10 its entirety, I decline to answer the  
11 question.

12 Q. And the main mansion in North  
13 Castle is the Meyer Mansion or Meyer  
14 House; right?

15           A.       For all the reasons provided in  
16 my answer, which is incorporated herein in  
17 its entirety, I decline to answer the  
18 question.

19 Q. Was any decision to donate the  
20 New Castle land that was made in 2012 a  
21 change from the prior year's plans?

22           A.       For all the reasons provided in  
23 my answer, which is incorporated herein in  
24 its entirety, I decline to answer the  
25 question.

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2 CERTIFICATION BY REPORTER

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4 I, Wayne Hock, a Notary Public of the  
5 State of New York, do hereby certify:

6 That the testimony in the within  
7 proceeding was held before me at the  
8 aforesaid time and place;

9 That said witness was duly sworn  
10 before the commencement of the testimony,  
11 and that the testimony was taken  
12 stenographically by me, then transcribed  
13 under my supervision, and that the within  
14 transcript is a true record of the  
15 testimony of said witness.

16 I further certify that I am not  
17 related to any of the parties to this  
18 action by blood or marriage, that I am not  
19 interested directly or indirectly in the  
20 matter in controversy, nor am I in the  
21 employ of any of the counsel.

22 IN WITNESS WHEREOF, I have hereunto  
23 set my hand this 6th day of October, 2020.

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